

U.S. CONSUMER PRODUCT SAFETY COMMISSION  
WASHINGTON, D.C. 20207

1999 DEC 28 P 1:12

LOG OF MEETING

SUBJECT: AMERICAN FIREWORKS STANDARDS LABORATORY (AFSL) TESTING PROGRAM

DATE OF MEETING: DECEMBER 6, 1999

PLACE OF MEETING: CPSC HEADQUARTERS/ROOM 725

LOG ENTRY SOURCE: PAMELA L. WELLER

DATE OF ENTRY: DECEMBER 28, 1999

COMMISSION ATTENDEES:

COMMISSIONER THOMAS MOORE

PAMELA L. WELLER, COUNSELOR TO COMMISSIONER MOORE

PATRICK RACE, CPSC/COMPLIANCE

NON-COMMISSION ATTENDEES:

JOHN ROGERS, EXECUTIVE DIRECTOR, AFSL

JOEL R. ANDERSON, VICE PRESIDENT, AFSL AND CHAIRMAN OF  
AMERICAN PROMOTIONAL EVENTS

ELLIOT BELILOS, GENERAL COUNSEL FOR AFSL AND PARTNER IN  
KELLER AND HECKMAN

JEN LEVINE, PRODUCT SAFETY LETTER

SUMMARY OF MEETING:

Mr. Rogers gave a short history of the AFSL program. He then talked about the differences in the CPSC testing requirements and that of AFSL, noting that perhaps as much as 50% of the failures they find are of AFSL testing requirements, which are in addition to those of the CPSC. He next outlined the changes that will be made to the AFSL program in the coming years. See the attached summary of the meeting provided by Mr. Rogers.

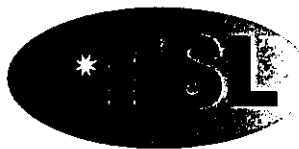
Commissioner Moore asked what percentage of fireworks were currently being tested and certified by AFSL. Mr. Rogers estimated that the figure was between 85% and 90%. Mr. Rogers also noted that the percentage of fireworks that was in compliance was steadily increasing. Mr. Race acknowledged that that was true.

Commissioner Moore praised the work being done by AFSL and congratulated them on their success. The meeting ended with the Commissioner thanking the AFSL representatives for coming by to update him on their activities.

CPSA 6 (b)(7) Cleared

☒ No Mfrs/Prvtlbrs or  
Products Identified

12/29/99  
263



# American Fireworks Standards Laboratory

---

7316 Wisconsin Avenue, Suite 214  
Bethesda, Maryland USA 20814  
Telephone: 301/907-9115  
Facsimile: 301/907-9117

## **MEETING WITH CPSC COMMISSIONERS** **MONDAY, DECEMBER 6, 1999** **11:30 AM; 1:30; 2:30 PM**

### **SUMMARY**

#### **I. PURPOSE OF MEETING**

To provide and update of AFSL activities and discuss any needed modifications to the AFSL program to improve the safety of fireworks and level of compliance with CPSC regulations.

#### **II. BACKGROUND**

- A. AFSL was established in 1989 to improve the quality and safety of fireworks manufactured in China and shipped to the U.S. Early focus was to develop standards incorporating all federal requirements for fireworks and monitoring efforts by factories to improve quality and safety, including encouraging in-house testing by the factories. CPSC participated in developing AFSL standards.
- B. Independent testing program was implemented in January 1994. The initial program was limited to Guangzhou area. The program was limited to 7 categories of fireworks identified as most likely to present a risk of injury. CPSC participated in determining which categories to test and in training of AFSL technicians.
- C. From the limited program established in 1994, AFSL has grown into a full scale-testing program covering all major product categories. The testing program now covers approximately 2 million cases of fireworks and is carried out in seven different regions in China. Program also includes advice and guidance to manufacturers in the form of annual seminars, factory newsletters, and direct meetings with factories to review test results for their products.

### **III. TESTING PROGRAM RESULTS**

- A. Volume of Testing – Exhibit A.**
- B. Products Categories Tested – Exhibit B.**
- C. Compliance Rate by Year since 1994 – Exhibit C.**

### **IV. DIFFERENCES IN AFSL AND CPSC PROGRAMS**

- A. Number of Shipments Tested**
  - 1. CPSC tests approximately 700 samples per year.**
  - 2. AFSL program tested approximately 14,000 lots in 1998.**
- B. Additional Provisions tested for by AFSL**
  - 1. CPSC Testing limited to CPSC regulations.**
  - 2. AFSL covers CPSC, DOT and AFSL Standards. Exhibit D.**

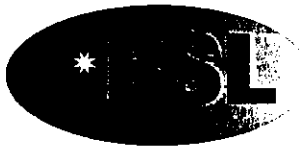
### **V. FUTURE ACTIVITIES/ MODIFICATIONS TO AFSL PROGRAM**

- A. The addition of Lead to prohibited chemicals list – Testing by AFSL will begin in August 2000.**
- B. Testing braided firecracker strings for fuse burn time. Final implementation will take place in 2000. Should reduce the number of early ignition injuries.**
- C. Testing of Assortment Packages. Program has been developed by AFSL with assistance of China industry. Voluntary program will begin in January 2000. The Board will make a decision on final implementation date in January.**
- D. Additional Test Centers: Jiangmen, Beihai, and LiLing.**
- E. Test Remaining Categories: Sparklers, Party Poppers, Booby Traps, Chasers, and Assortment Packages.**
- F. Expand Scope of Factory Assistance -- Meet with more factories directly to review product failures and discuss ways of correcting.**

### **VI. AREAS OF COOPERATION BETWEEN AFSL AND CPSC**

- A. Increase focus on illegal salutes and fireworks not tested by AFSL. Necessary resources to accomplish this would be made available by continuing to reduce surveillance of AFSL tested shipments.**
- B. Cooperate in the Development of a Test Procedure of Determining What Constitutes a Report in Aerial Devices.**
- C. Faster Reporting by CPSC of Results on AFSL-Tested Shipments.**

**\* \* \* \***



# American Fireworks Standards Laboratory

7316 Wisconsin Avenue, Suite 214  
Bethesda, Maryland USA 20814  
Telephone: 301/907-9115  
Facsimile: 301/907-9117

**D**

## AREAS COVERED BY AFSL TESTING PROGRAM

The AFSL Testing Program cover the following provisions for consumer fireworks devices:

- A. ALL CPSC REGULATIONS**
- B. DOT REGULATIONS FOR SHIPPING**
- C. THE FOLLOWING ADDITIONAL PROVISIONS FROM THE AFSL STANDARDS:**
  - 1. Limit of 12 shells per retail pack for reloadable tube aerial shell devices.
  - 2. Requirement for one-piece safety fuse for reloadable shell devices.
  - 3. The inclusion of Lead as a prohibited chemical.
  - 4. Dynamic Stability Test (Two-inch Foam Test) for large mine and shell devices (in addition to 60° tipover test required by CPSC).
  - 5. Flight Trajectory Test for Rockets, Missiles and Saturn Missile Battery.
  - 6. Fuse Burn Time for Firecrackers, to include Braided Strings of Firecrackers in 2000.
  - 7. Launcher Tube Integrity Test for Reloadable Shell Devices.
  - 8. 18° Tilt Block Test for Mine and Shells and Missiles, and 22° Tilt Block Test for Reloadable Tube Aerial Shell Devices (CPSC's is 12° for both items.)
  - 9. Prohibition on reports in ground spinners;
  - 10. Enhanced Caution Labels of all Products.

\* \* \*

*Perhaps  
50% of  
these  
features are  
of AFSL  
requirements*



# American Fireworks Standards Laboratory

7316 Wisconsin Avenue, Suite 214  
Bethesda, Maryland USA 20814  
Telephone: 301/907-9115  
Facsimile: 301/907-9117

## Exhibit B

### PRODUCTS COVERED BY AFSL TESTING PROGRAM

#### 1994

1. Firecrackers
2. Bottle Rockets
3. Mine and Shell Devices
4. Reloadable Tube Aerial Shells
5. Roman Candles
6. Jumping Jacks
7. Missiles

#### 1999

1. Firecrackers
2. Bottle Rockets
3. All Other Rockets
4. Mine and Shell Devices
5. Reloadable Tube Aerial Shells
6. Roman Candles
7. Missiles
8. Fountains
9. Jumping Jack Ground Spinners
10. All Other Ground Spinners
11. Fountains
12. Helicopters
13. Wheels
14. Toy Smoke and Flitter Devices
15. Snakes
16. Novelties
17. Combination Devices

### REMAINING CATEGORIES NOT TESTED

1. Sparklers
2. Party Poppers
3. Chasers
4. Assortment Packages

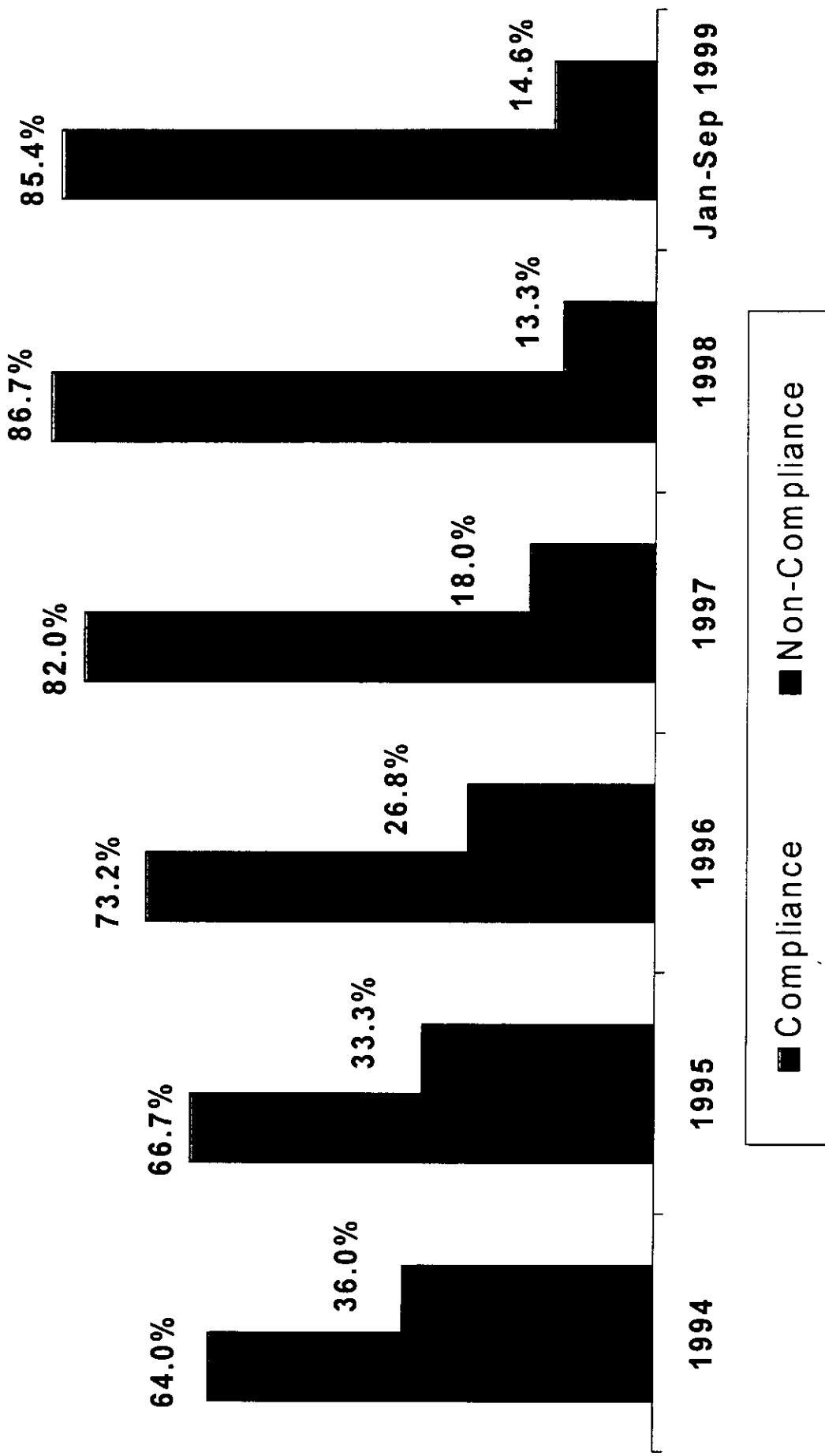
*will be in  
tested  
amount - {*

*will be  
added  
in 2000*

*estimate:  
85-90%  
of volume of  
product is  
being tested  
by AFSL*

C

## QIP Compliance Percentage By Year



A

# Cases Tested By Year

